

STRAFFI & STRAFFI

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Attorney for Trustee

Daniel E. Straffi,

DS1991

In re:) UNITED STATES BANKRUPTCY COURT
) FOR THE DISTRICT OF NEW JERSEY
)
STONE, PATRICK) Chapter 7 Proceeding
) Case No: 10-28276/RTL
)
) NOTICE OF MOTION FOR TURNOVER
Debtor.) OF VEHICLE, ATTORNEY'S FEES, COSTS
) AND FOR OTHER RELIEF
)
) Hearing Date: November 14, 2011 at 10:00 am
) ORAL ARGUMENT REQUESTED

TO: All parties on mailing list annexed hereto.

PLEASE TAKE NOTICE that on November 14, 2011 at 10:00 a.m. or as soon thereafter as the matter may be heard, Daniel E. Straffi, attorney for Trustee, shall move before the Honorable Raymond T. Lyons of the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey for the entry of an Order compelling the debtor to turnover to the Trustee a motor vehicle, attorney's fees, costs and for other relief.


PLEASE TAKE FURTHER NOTICE that if you contest this Motion you must appear in Court on the date noted and you are further required to file with the Court and serve on the undersigned a written response no later than seven days prior to the hearing date set forth herein. This Motion shall be deemed uncontested unless responsive papers are timely filed; and

PLEASE TAKE FURTHER NOTICE that the movant shall rely upon the attached certification. No brief is submitted since no unique question of law exists; and

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument;

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached hereto.

Dated: 10/19/11


DANIEL E. STRAFFI
Attorney for Trustee

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Newark, NJ 07102

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(Debtor)

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(Attorney for Debtor)